

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION,)	
et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 98-CV-5591
)	
ERIC H. HOLDER, in his official)	
capacity as ATTORNEY GENERAL)	
OF THE UNITED STATES,)	
)	
Defendant.)	

JOINT MOTION TO EXTEND TIME

Plaintiffs American Civil Liberties Union *et al.* and Defendant Eric H. Holder hereby jointly move this Court for additional time in which to file Plaintiffs' renewed motion for costs, fees, and expenses pursuant to 28 U.S.C. § 2412.

The instant motion arises out of the dispute between the parties regarding Plaintiffs' claims for costs, fees and expenses pursuant to 28 U.S.C. § 2412.

On June 30, 2009, this Court entered an Order providing, *inter alia*, that Plaintiffs submit their motion for fees, costs and expenses by September 1, 2009. That Order was most recently amended by a subsequent Order dated September 1, 2009, extending the prior deadline until October 1, 2009.

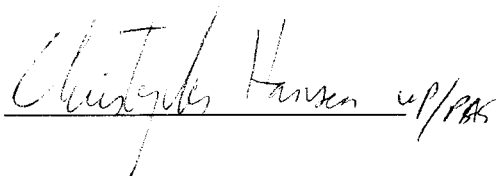
At this point, the parties have reached an agreement on the issue of costs, fees and expenses; however, additional time is required to execute the terms of that agreement. Thus, the

parties jointly request that this Court re-extend the schedule set out in this Court's September 1, 2009 Order such that:

- 1) Plaintiffs' renewed motion for costs, fees and expenses shall be filed by November 16, 2009;
- 2) Defendant's response in opposition shall be filed by January 18, 2010; and
- 3) Plaintiffs' reply shall be filed by February 18, 2010.

Dated: September 28, 2009

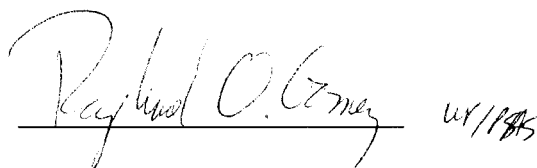
AMERICAN CIVIL LIBERTIES UNION

Handwritten signature of Christopher Hansen in cursive, with the initials "ur/pas" written to the right of the signature.

Christopher Hansen, Esq.
125 Broad Street
18th Floor
New York, New York 10004
(212) 549-2606
Email: chansen@aclu.org

Attorneys for Plaintiffs

U.S. DEPARTMENT OF JUSTICE

Handwritten signature of Raphael O. Gomez in cursive, with the initials "ur/pas" written to the right of the signature.

Raphael O. Gomez, Esq.
Room 6144
20 Massachusetts Ave., NW
Washington, DC 20530
(202) 514-1318
Email: raphael.gomez@usdoj.gov

Attorneys for Defendant